

JORDAN K. CAMERON (12051)
jcameron@djplaw.com
DURHAM, JONES & PINEGAR, P.C.
3301 N. Thanksgiving Way, Suite 400
Lehi, UT 84043
Telephone: (801) 375-6600
Fax: (801)375-3865

Attorneys for Plaintiff ZooBuh, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

ZOOBUH, INC., a Utah Corporation Plaintiff, vs. SAVICOM, INC., et al. Defendants.	MOTION TO ISSUE SEALED WRIT Case No.: 2:17cv01098 JNP Judge Jill N. Parrish
---	--

Plaintiff ZooBuh, Inc., pursuant to DUCivR 5-3 and the *Standard Protective Order*, and consistent with the Court Orders found in Sealed Documents 83 and 91, moves the Court to issue a sealed writ. Plaintiff filed a sealed *Application for Writ* on April 19, 2019.

Preferred Disposition

Plaintiff respectfully requests that the Court issue a sealed *Writ of Execution* and that such remain temporarily sealed for the same length of time ordered in Documents 83 and 91.

Argument

- I. THE COURT SHOULD ISSUE A SEALED WRIT OF EXECUTION BECAUSE THE INFORMATION THEREIN IS PROTECTED INFORMATION AND BECAUSE THE DISCLOSURE OF THE INFORMATION THEREIN WILL FRUSTRATE THE PURPOSE OF THE WRIT

The *Standard Protective Order* defines Confidential - Attorney's Eyes Only information for the following types of past, current, or future PROTECTED INFORMATION: (1) sensitive technical information, including current research, development and manufacturing information and patent prosecution information, (2) sensitive business information, including highly sensitive financial or marketing information and the identity of suppliers, distributors and potential or actual customers, (3) competitive technical information, including technical analyses or comparisons of competitor's products, (4) competitive business information, including non-public financial or marketing analyses or comparisons of competitor's products and strategic product planning, or (5) any other PROTECTED INFORMATION the disclosure of which to non-qualified people subject to this Standard Protective Order the producing party reasonably and in good faith believes would likely cause harm.

Standard Protective Order, § 2(b).

Within the *Writ* is highly sensitive, confidential information including ZooBuh's business practices, plans and strategies related to the judgment. None of the information is presently known to the public or to Defendants, and the disclosure of such to the public or to the Defendants will frustrate the purpose of the *Writ*, which purpose this Court has previously recognized in sealed Documents 83 and 91. As acknowledge by the Court therein, the public disclosure of the information is likely to irreparably harm the Plaintiff.

Further, the information in question qualifies as Confidential - Attorney's Eyes Only pursuant to the *Standard Protective Order* that governs this case pursuant to DUCivR 26-2, as it collectively comprises confidential business plans and strategies of ZooBuh, and should not be disclosed to the public or to the Defendants.

The sealed filing has been narrowly tailored to protect only the specific information requiring protection. Furthermore, the Plaintiff only requests that the *Writ* be sealed temporarily.

Conclusion

Based on the foregoing, the Plaintiff respectfully requests that the Court issue a sealed *Writ.*

DATED this 19th day of April 2019.

DURHAM JONES & PINEGAR, P.C.

/s/ Jordan K. Cameron
Jordan K. Cameron
Attorneys for Plaintiff